

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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03-MDL-1570 (GBD)(SN)

In Re:

TERROR ATTACKS ON  
SEPTEMBER 11, 2001

**IRAN NOTICE  
OF AMENDMENT**

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This document relates to:

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-6977 (GBD)(SN)  
*Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-7236 (GBD)(SN)  
*York, et al. v. al Qaeda Islamic Army, et al.*, Case No. 03-cv-5493 (GBD)(SN)

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

### CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>New Plaintiff's Name (alphabetical by last name)</b>	<b>New Plaintiff's State of Residency at Filing (or death)</b>	<b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
1	Vasel, Ryan A.	New Jersey	U.S. Citizen	Scott Vasel	Son	<i>Bauer</i> action <sup>1</sup> Paragraph
2	Vulpone, Heather	New Jersey	U.S. Citizen	David R. Meyer	Daughter	<i>Bauer</i> action Paragraph
3	Wager, Margaret	New Jersey	U.S. Citizen	Scott Johnson	Sister	<i>Bauer</i> action Paragraph
4	Wilson, Melissa	Michigan	U.S. Citizen	Todd M. Beamer	Sister	<i>Bauer</i> action Paragraph
5	Wisniewski, Erica	Florida	U.S. Citizen	Alan L. Wisniewski	Daughter	<i>Bauer</i> action Paragraph
6	Wisniewski, Jessica	New Jersey	U.S. Citizen	Alan L. Wisniewski	Daughter	<i>Bauer</i> action Paragraph
7	Wisniewski, Kathleen	New Jersey	U.S. Citizen	Alan L. Wisniewski	Wife	<i>Bauer</i> action Paragraph
8	Wisniewski, Matthew	New Jersey	U.S. Citizen	Alan L. Wisniewski	Son	<i>Bauer</i> action Paragraph
9	Wisniewski, Est. of Muriel	New Jersey	U.S. Citizen	Alan L. Wisniewski	Mother	<i>Bauer</i> action Paragraph
10	Wyatt, Laura	Connecticut	U.S. Citizen	Stacey Sanders	Sister	<i>Bauer</i> action Paragraph
11	York, Aidan	New Jersey	U.S. Citizen	Kevin P. York	Son	<i>York</i> action <sup>2</sup> Paragraph
12	York, Chiemi	New Jersey	U.S. Citizen	Kevin P. York	Wife	<i>York</i> action Paragraph

<sup>1</sup> *Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-7236 (GBD)(SN), herein referred to as *Bauer* action, was consolidated into the *Ashton* action in the *Ashton* First Amended Consolidated Master Complaint filed on 08/01/2003, ECF No. 32.

<sup>2</sup> *York, et al. v. al Qaeda Islamic Army, et al.*, Case No. 03-cv-5493 (GBD)(SN), herein referred to as *York* action, was consolidated into the *Ashton* action in the *Ashton* First Amended Consolidated Master Complaint filed on 08/01/2003, ECF No. 32.

13	York, Connor	New Jersey	U.S. Citizen	Kevin P. York	Son	<i>York</i> action Paragraph
14	York, John	Florida	U.S. Citizen	Kevin P. York	Father	<i>York</i> action Paragraph
15	York, Timothy	Arizona	U.S. Citizen	Kevin P. York	Brother	<i>York</i> action Paragraph
16	Zisa, Anthony	New York	U.S. Citizen	Salvatore Zisa	Brother	<i>Bauer</i> action Paragraph
17	Zisa, Christina	New York	U.S. Citizen	Salvatore Zisa	Daughter	<i>Bauer</i> action Paragraph
18	Zisa, Est. of Joseph	New Jersey	U.S. Citizen	Salvatore Zisa	Father	<i>Bauer</i> action Paragraph
19	Zisa, Joseph	New York	U.S. Citizen	Salvatore Zisa	Son	<i>Bauer</i> action Paragraph
20	Zisa, Josephine	New Jersey	U.S. Citizen	Salvatore Zisa	Mother	<i>Bauer</i> action Paragraph
21	Zisa, Roseann	New Jersey	U.S. Citizen	Salvatore Zisa	Wife	<i>Bauer</i> action Paragraph

Dated: December 2, 2021

Respectfully submitted,

BAUMEISTER & SAMUELS, P.C.

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